

## **Exhibit 2**

## Kaisani, Fareed

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**From:** Alaniz, Omar  
**Sent:** Saturday, July 18, 2020 10:47 AM  
**To:** Kaisani, Fareed  
**Subject:** FW: Attached notice

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Omar J. Alaniz** | Baker Botts L.L.P.  
[Bio](#) | [omar.alaniz@bakerbotts.com](mailto:omar.alaniz@bakerbotts.com)  
T 214.953.6593 | M 469.682.7472

---

**From:** Eric Blue <Eric.Blue@capitalpark.net>  
**Sent:** Tuesday, December 3, 2019 5:31 PM  
**To:** Alaniz, Omar <Omar.Alaniz@BakerBotts.com>  
**Cc:** Kazlow, Jordan <jordan.kazlow@BakerBotts.com>; David, Danny <danny.david@bakerbotts.com>; Genender, David <david.genender@bakerbotts.com>  
**Subject:** RE: Attached notice

[EXTERNAL EMAIL]

Omar –

Will come back here to you ASAP through counsel. Have selected one and am just taking care of the engagement process now.

---

**Eric C. Blue** | [eric.blue@capitalpark.net](mailto:eric.blue@capitalpark.net)  
D: 972-525-8546 | M: 214-205-6215 | F: 972-525-8720  
[www.capitalpark.net](http://www.capitalpark.net)

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**From:** [Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com) <[Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)>  
**Sent:** Monday, December 2, 2019 3:56 PM  
**To:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>  
**Cc:** [jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com); [danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com); [david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)  
**Subject:** RE: Attached notice

Just circling back on this... we can be available any time today up to 5:30pm CT. If today doesn't work, I am fairly flexible tomorrow. As I mentioned last week, there are a number of deadlines fast approaching. If you need recommendations of qualified, ethical bankruptcy counsel, I am happy to provide some recommendations. Of course, we are not your counsel, and we hope that you will seek out counsel on your own. We just want to move the process along.

---

**From:** Alaniz, Omar  
**Sent:** Monday, December 2, 2019 1:57 PM  
**To:** 'Eric Blue' <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Cc:** Kazlow, Jordan <[jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)>; David, Danny <[danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com)>; Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Subject:** RE: Attached notice

Eric, I will gather availability on our end. But you should know that in light of the court's entry of the orders for relief, the court is cancelling the scheduling conference this Friday. That also means that we do not need to file the joint pre-conference statement. However, the court will still hold a hearing this Friday at 10am on our motion to jointly administer the 3 bankruptcy cases (Judge Hale's courtroom).

---

**From:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Sent:** Monday, December 2, 2019 12:26 PM

**To:** Alaniz, Omar <[Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)>

**Cc:** Kazlow, Jordan <[jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)>; David, Danny <[danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com)>; Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Subject:** RE: Attached notice

[EXTERNAL EMAIL]

Stuck in holiday travel traffic and just had a flight cancel...rebooking puts me on a flight during our scheduled time (if it actually goes). Does later work or alternatively, can you email me over the questions or items you want covered and I can respond in writing and then we can follow up by phone? It's a bit of a zoo at the airport right now so that ensures we can cover what you want to.

Thx

---

Eric C. Blue | [eric.blue@capitalpark.net](mailto:eric.blue@capitalpark.net)

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---

**From:** [Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com) <[Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)>

**Sent:** Tuesday, November 26, 2019 10:24 PM

**To:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Cc:** [jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com); [danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com); [david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

**Subject:** RE: Attached notice

Eric, the bankruptcy court entered orders today granting the involuntary bankruptcy petitions against you and the two Capital Park entities. Please see the attached orders, which set forth various deadlines (as early as 7 days from today). I'm also attaching notices of appointment of a chapter 7 trustee and the setting of a creditors meeting.

**Omar J. Alaniz** | Baker Botts L.L.P.

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T 214.953.6593 | M 469.682.7472

2001 Ross Avenue, Suite 900  
Dallas, Texas 75201



**From:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Sent:** Monday, November 25, 2019 4:11 PM

**To:** Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Cc:** Alaniz, Omar <[Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)>; Kazlow, Jordan <[jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)>; David, Danny <[danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com)>

**Subject:** Re: Attached notice

[EXTERNAL EMAIL]

David -

The best number would be 214-205-6215. Can you please send a calendar invite?

-----  
**Eric C. Blue** | [eric.blue@capitalpark.net](mailto:eric.blue@capitalpark.net)  
D: [972-525-8546](tel:972-525-8546) | M: [214-205-6215](tel:214-205-6215)  
[www.capitalpark.net](http://www.capitalpark.net)

On Nov 25, 2019, at 5:03 PM, "[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)" <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)> wrote:

Eric,

We can talk Monday afternoon. To be clear, I did not “propose” bankruptcy in my email. The reference to the “pending bankruptcy” was a reference to the involuntary bankruptcy case that was filed/instituted on October 29, 2019. You were provided notice of it.

Let’s schedule the call to discuss the joint pre-conference statement and anything else you would like to discuss for 2 pm on Monday, December 2, 2019. Give us the best number to call to reach you then.

**David Genender**

Partner

**Baker Botts L.L.P.**

[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

T +1.214.953.6936

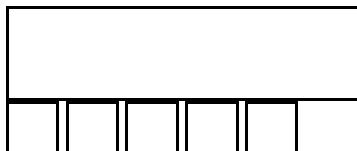
F +1.214.661.4936

M +1.214.263.4666

2001 Ross Ave., Suite 900

Dallas, Texas 75201

USA



---

**From:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Sent:** Monday, November 25, 2019 3:58 PM

**To:** Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Cc:** Alaniz, Omar <[Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)>; Kazlow, Jordan <[jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)>;

David, Danny <[danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com)>

**Subject:** Re: Attached notice

[EXTERNAL EMAIL]

David -

I will forward the note. I currently am on the road and am working off my iPad (due to a crashed laptop that happened this am) but as soon as I get it back in hand I will forward over. As for as a call I can do next Monday anytime in the afternoon. As for as the bankruptcy matter not sure what is meant by "acknowledged and addressed" but I can say that I acknowledged that you proposed it and my addressing it is that I have no interest in anything other than finding a pathway towards settlement (including bankruptcy).

-----  
**Eric C. Blue** | [eric.blue@capitalpark.net](mailto:eric.blue@capitalpark.net)

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On Nov 25, 2019, at 4:53 PM, "[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)" <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)> wrote:

Eric,

I did not get a response to my November 15, 2019 email to you proposing a meeting or a call. Please forward a copy of the email that you sent so I can have our IT department look into it.

No one is bullying you. As was very clear in the suggestion of bankruptcy that I sent to you on November 9, 2019 (in an email to which you responded), an involuntary bankruptcy case was filed on October 29, 2019. As I told you on November 9, 2019 "Any resolution will have to be made knowing that the pending bankruptcy action needs to be acknowledged and addressed."

If you would like to discuss any of these issues, please let us know. In any event, we must confer regarding the joint pre-conference statement as Omar mentioned below. We are available Wednesday of this week and next Monday.

**David Genender**

Partner

**Baker Botts L.L.P.**

[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

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Dallas, Texas 75201  
USA



---

**From:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>  
**Sent:** Monday, November 25, 2019 3:41 PM  
**To:** Alaniz, Omar <[Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)>  
**Cc:** Kazlow, Jordan <[jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)>; David, Danny <[danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com)>; Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>  
**Subject:** Re: Attached notice

[EXTERNAL EMAIL]

Omar -

Not sure what's going on here. I put a settlement proposal in front of David and he asked if I was available for a call last Wednesday...I replied I was but asked if it could be later in the day and never heard back. I have no interest in filing for bankruptcy and won't be bullied into doing so. I would like to pay off your client's obligations period and proposed a schedule with a fairly short time window. Does that not work and if not lets find something that does as this bankruptcy thing has no legs.

-----  
**Eric C. Blue** | [eric.blue@capitalpark.net](mailto:eric.blue@capitalpark.net)  
D: [972-525-8546](tel:972-525-8546) | M: [214-205-6215](tel:214-205-6215)  
[www.capitalpark.net](http://www.capitalpark.net)

On Nov 25, 2019, at 4:32 PM, [Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com) <[Omar.Alaniz@bakerbotts.com](mailto:Omar.Alaniz@bakerbotts.com)> wrote:

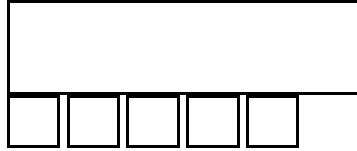
Eric, I am Portfolio Secure Loan's bankruptcy attorney. We mailed and emailed to you a copy of the involuntary petitions, summons, and the attached scheduling order. Under the court's order, we are required to submit a joint pre-conference statement in advance of the December 6 (10am) scheduling conference to be held before U.S. Bankruptcy Judge Hale. The court requires that we collaborate on a joint statement, and we are to advise the court of the date/time/location of our meeting.

We are working on a draft joint pre-conference statement that we will share with you. In the meantime, we should schedule our joint conference. Are you available Wednesday November 27 or Monday December 2? We can host the meeting in our offices downtown Dallas. Or we can talk by phone. Please let me know when you're available.

**Omar J. Alaniz** | **Baker Botts L.L.P.**  
[Bio](mailto:omar.alaniz@bakerbotts.com) | [omar.alaniz@bakerbotts.com](mailto:omar.alaniz@bakerbotts.com)

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Dallas, Texas 75201



---

**From:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>  
**Sent:** Sunday, November 10, 2019 6:14 PM  
**To:** Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>  
**Cc:** Kazlow, Jordan <[jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)>; David, Danny <[danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com)>; Alaniz, Omar <[Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)>  
**Subject:** RE: Attached notice

[EXTERNAL EMAIL]

David –

I am proposing the following:

- \$500k on or before 12/31;
- \$1mm or before February 15; and
- \$1.5mm before March 31.

Regards -

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Eric C. Blue | [eric.blue@capitalpark.net](mailto:eric.blue@capitalpark.net)  
D: 972-525-8546 | M: 214-205-6215 | F: 972-525-8720  
[www.capitalpark.net](http://www.capitalpark.net)

---

**From:** [david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)  
<[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>  
**Sent:** Saturday, November 9, 2019 5:10 PM  
**To:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>  
**Cc:** [jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com); [danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com); [Omar.Alaniz@BakerBotts.com](mailto:Omar.Alaniz@BakerBotts.com)  
**Subject:** RE: Attached notice

Mr. Blue,

Attached is a copy of a suggestion of bankruptcy that was filed in the state court action relating to your pre-suit deposition.

Any resolution will have to be made knowing that the pending bankruptcy action needs to be acknowledged and addressed.

What are you prepared to propose?

**David Genender**

Partner

**Baker Botts L.L.P.**

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**From:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Sent:** Friday, November 8, 2019 3:18 AM

**To:** Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Subject:** RE: Attached notice

[EXTERNAL EMAIL]

David –

Do you have some time this weekend | Monday to discuss path to resolving this? Apologies for being MIA here but the resolution of the medical issues I referenced in my prior email were less complete than I thought (hoped) at the time of writing but they are finally resolved now. I genuinely would like to find an amicable way to resolve this ASAP.

thx

---

**From:** [david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

<[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Sent:** Thursday, September 26, 2019 9:41 AM

**To:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Subject:** RE: Attached notice

Mr. Blue,

Can we set a time to talk this afternoon after 3 pm?

**David Genender**



Partner

**Baker Botts L.L.P.**

[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

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Dallas, Texas 75201

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---

**From:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Sent:** Wednesday, September 25, 2019 3:22 PM

**To:** Genender, David <[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Subject:** RE: Attached notice

**Importance:** High

[EXTERNAL EMAIL]

David –

Apologies for the delay in responding but I have been back and forth in Dallas and out of town dealing with some medical issues. In short, I would like to settle this matter with your client without incurring loads of legal fees (no offense). Would you inquire of your client what would be the number to resolve this matter?

Thanks in advance -

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**From:** [david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

<[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)>

**Sent:** Friday, September 6, 2019 3:25 PM

**To:** Eric Blue <[Eric.Blue@capitalpark.net](mailto:Eric.Blue@capitalpark.net)>

**Cc:** [danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com); [jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)

**Subject:** Attached notice

Mr. Blue,

Please see the attached notice that is being filed today.

**David Genender**

Partner

**Baker Botts L.L.P.**

[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

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**From:** Genender, David

**Sent:** Monday, August 5, 2019 4:12 PM

**To:** 'eric.blue@capitalpark.net' <[eric.blue@capitalpark.net](mailto:eric.blue@capitalpark.net)>

**Cc:** David, Danny <[danny.david@bakerbotts.com](mailto:danny.david@bakerbotts.com)>; Kazlow, Jordan  
<[jordan.kazlow@BakerBotts.com](mailto:jordan.kazlow@BakerBotts.com)>

**Subject:** Attached letter

Mr. Blue,

Please see attached letter.

**David Genender**

Partner

**Baker Botts L.L.P.**

[david.genender@bakerbotts.com](mailto:david.genender@bakerbotts.com)

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<Blue Scheduling Order.pdf>

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